

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(RICHMOND DIVISION)

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF  
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-AWA-BMK

**DEFENDANT-INTERVENORS' WITNESS LIST**

Defendant-Intervenors, the Virginia House of Delegates and Virginia House of Delegates Speaker William J. Howell ("Defendant-Intervenors"), through counsel, reserve their right to call the following witnesses at trial:

**I. Fact Witnesses**

1. Delegate Chris Jones – a member of the Virginia House of Delegates and the architect of the redistricting plan at issue in this proceeding. He may testify about the plan and the 2011 redistricting process.
2. Delegate Christopher K. Peace – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
3. Delegate Christopher P. Stolle – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
4. Delegate John M. O'Bannon, III – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
5. Delegate Thomas Wright – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this

proceeding. He may testify about borders of his district created by the 2011 redistricting process.

6. Dr. James W. Loewen – a professor of sociology who submitted an expert report in the case *West v. Gilmore*, CL01-84 (Va. Cir. Ct.). Dr. Loewen may testify for the purposes of admitting his report under the Federal Rules of Evidence, identifying relevant conclusions of his report, and explaining how his report was prepared.
7. John Morgan – a demographer who assisted Delegate Jones and the House of Delegates in drawing the 2011 map. He may testify about the 2011 redistricting process.

Defendant-Intervenors submit this list of witnesses without waiving any of their rights, and specifically reserve the right to call any rebuttal or impeachment witnesses and to supplement this list if any listed witness becomes unavailable to testify at trial.

## **II. Expert Witnesses**

1. Thomas Hofeller – Dr. Hofeller has been designated as an expert witness and may testify about the matters addressed in his expert reports.
2. Trey Hood – Dr. Hood has been designated as an expert witness and may testify about the matters addressed in his expert reports.
3. Jonathan Katz – Dr. Katz has been designated as an expert witness and may testify about the matters addressed in his expert reports.

Defendant-Intervenors reserve the right to call any witness identified in the witness lists of other parties to this action.

Dated: September 14, 2017

Respectfully submitted,

VIRGINIA HOUSE OF DELEGATES  
AND VIRGINIA HOUSE OF DELEGATES  
SPEAKER WILLIAM J. HOWELL

By Counsel

/s/ Katherine L. McKnight

Katherine L. McKnight (VSB No. 81482)

E. Mark Braden (*pro hac vice*)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

kmcknight@bakerlaw.com

mbraden@bakerlaw.com

rraile@bakerlaw.com

Dalton L. Oldham, Esq. (*pro hac vice*)

1119 Susan St.

Columbia, SC 29210

Telephone: 803-772-7729

dloesq@aol.com

*Attorneys for the Virginia House of Delegates and  
Virginia House of Delegates Speaker William J. Howell*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of September, 2017, the foregoing Defendant-Intervenors' Witness List was filed and served on all counsel of record pursuant to the Court's electronic filing procedures using the Court's CM/ECF system.

/s/ Katherine L. McKnight

Katherine L. McKnight (VSB No. 81482)

E. Mark Braden (*pro hac vice*)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

kmcknight@bakerlaw.com

mbraden@bakerlaw.com

rraile@bakerlaw.com

*Attorneys for the Virginia House of Delegates and  
Virginia House of Delegates Speaker William J. Howell*